

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 2 of the Commission's)	ET Docket No. 00-258
Rules)	
to Allocate Spectrum Below 3 GHz for Mobile)	
and Fixed Services to Support the)	
Introduction of New Advanced Wireless)	
Services, including Third Generation Wireless)	
Systems)	
)	

Nokia, Inc. ("Nokia") hereby comments on the final report, "*An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands*" released by the National Telecommunications and Information Administration (NTIA) on July 23, 2002 ("*NTIA Report*") in the Federal Communications Commission's ("Commission") above-captioned proceeding concerning the allocation of spectrum for new advanced wireless services, including third generation ("3G") wireless or International Mobile Telecommunications-2000 ("IMT-2000").

Nokia is a broadly held company listed on six major exchanges worldwide with key growth areas in wireless and wireline communications. A pioneer in mobile telephony, Nokia is the world's leading mobile phone supplier and a top supplier of mobile, fixed and IP networks, as well as related services.

Nokia applauds the recognition in the NTIA Report that more spectrum is needed "to meet the increasing demand for new services"¹, in particular advanced mobile wireless communications services such as 3G, and the identification of 90 MHz of spectrum that can be made available for 3G. This is a good first step towards allocating and making available the spectrum needed to meet the demands of advanced mobile wireless services by 2010 and Nokia looks forward to working with the

Commission and NTIA on future steps to find and make available additional spectrum for advanced wireless services.

Nokia supports the pairing of spectrum from the 1700 MHz band with frequencies at 2100 MHz as this pairing takes advantage of globally common uplink and downlink bands for mobile services. The spectrum at 2110-2170 MHz is already harmonized with the downlink band in existing 3G systems in Europe and Asia, while the 1710-1755 MHz band will provide longer-term harmonization with the uplink band for current 2nd generation mobile systems at 1710-1785 MHz in Europe, Asia and some Latin American countries. Global harmonization of spectrum, in particular with respect to mobile terminals, creates economies of scale, which in turn allow less complex, lower cost and more innovative equipment to be brought to the market sooner. Additionally, globally common spectrum facilitates international roaming.

1710-1755 MHz

Going forward, the Commission and NTIA should work together to make the identified spectrum available---not just allocated and licensed---as soon as possible by establishing a clear timeframe and schedule for clearing 1710-1755 MHz in a timely fashion. The NTIA Report states that the 1710-1755 MHz band “would be substantially cleared of federal systems...[and] would relocate or modify their operations no later than December 2008.”² Nokia encourages the Commission to issue service rules that ensure relocation of incumbent Federal systems as soon as possible and no later than 2008. Additionally, Nokia encourages the Commission to work with Federal users in the 1710-1755 MHz band to identify costs associated with relocation prior to auction to facilitate quick relocation and create market certainty for bidders. If legislation, such as that currently proposed by the Administration, were passed that creates a relocation trust fund to pay for relocation of Federal users from auction proceeds, the Commission should take whatever actions are necessary to implement the trust fund as soon as possible after passage of the legislation.

¹ National Telecommunications and Information Administration (NTIA), *An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands*, July 22, 2002, p.1.

² *Ibid*, p.2.

Additionally, the Commission should issue service rules that clarify the resolution of interference issues where Federal systems continue to share 1710-1755 MHz on a secondary basis. Where Federal systems continue to operate in either 1710-1755 MHz or 2110-2120 MHz, such as Cherry Point, NC, Yuma, Arizona, and Goldstone, California, the Commission should work with NTIA and the Department of Defense ("DoD") to minimize interference into 3G systems.

While Nokia understands NTIA's position in not recommending 1755-1770 MHz as viable for sharing or relocation in the immediate future, we believe that it should be made available for advanced wireless services in the longer-term, preferably paired with 2155-2170 MHz, and encourage the interested parties to continue to work on addressing sharing and relocation issues related to this band.

2110-2170 MHz

A key element for ensuring efficient use of the spectrum is that spectrum allocated for a service be contiguous. Failure to do so risks "wasting" spectrum on guard bands between different services and creates greater equipment complexity and cost. Towards this end, Nokia urges the Commission to identify contiguous spectrum in the 2100 MHz band for pairing with 1710-1755 MHz. At a minimum, the Commission should identify 2110-2155 MHz for pairing with 1710-1755 MHz. This will require relocation of current incumbent Multi-point Distribution Service (MDS) licensees currently located at 2150-2162 MHz to avoid adjacent channel interference between these fixed services and 3G; which would require guard bands between the two services, an inefficient use of prime spectrum. Nokia urges the Commission to relocate these fixed services to spectrum above 3GHz from spectrum best suited for mobile services.

Nokia urges the Commission to allocate all of 2110-2170 MHz available for 3G services. The Commission can auction 1710-1755 MHz paired with 2110-2155 MHz in the near-term while it attempts to identify additional appropriate spectrum for pairing with 2155-2170 MHz, preferably the spectrum at 1755-1770 MHz when it can be made available.

Summary

Nokia supports the conclusion of the NTIA report that more spectrum can be made available for advanced wireless services, such as 3G, as a good first step. We encourage the Commission and NTIA to work towards making additional spectrum available to meet the demand for advanced wireless services by 2010.

We support the proposed pairing of spectrum from the 1700 MHz band with 2100 MHz band as taking advantage of globally harmonized spectrum, but encourage the Commission to ensure that the spectrum made available from 2110-2170 MHz is contiguous.

Nokia urges the Commission to make 1710-1755 MHz available at or shortly after auction by working with NTIA to establish a clear timeframe and schedule for clearing the band. We encourage the Commission to facilitate the clearing of and sharing within this spectrum by issuing appropriate service rules, working with NTIA on an ongoing basis and taking any necessary steps to implement a relocation trust fund, if the enabling legislation is passed.

Finally, Nokia urges the Commission and NTIA to continue to work towards identifying and making available the necessary additional spectrum for advanced wireless services, including continuing to look at relocation and sharing issues at 1755-1770 MHz in order to make all of 1710-1770 MHz and 2110-2170 MHz available.